



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2015 AUG 19 AM 9:04

MEMORANDUM

SENSITIVE

TO: The Commission

FROM: Daniel A. Petalas
Associate General Counsel for Enforcement

Kathleen M. Guith
Deputy Associate General Counsel for Enforcement

BY: Mark Allen
Assistant General Counsel *MA*

Tanya Senanayake *TDS*
Attorney

SUBJECT: MUR 6943 (Republican Party of Orange County)
Pre-Probable Cause Conciliation Agreement

2015 AUG 19 AM 8:51
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FEDERAL ELECTION
COMMISSION

Attached is a conciliation agreement signed by counsel on behalf of the Republican Party of Orange County ("Committee") and Jeffrey Lalloway in his official capacity as treasurer (collectively "Respondents"). See Attachment 1 (Signed Conciliation Agreement). This agreement, which we recommend the Commission accept, would settle violations of 52 U.S.C. §§ 30104(b) and 30125(b) stemming from the Committee's failure to report debts totaling \$56,089 during the 2010 election cycle and improperly spending \$73,465 on voter registration activities using Levin funds transferred to it from the California Republican Party. See Certification, MUR 6943 (June 17, 2015) (finding reason to believe that Respondents violated 52 U.S.C. §§ 30104(b) and 30125(b) and authorizing pre-probable cause conciliation).

We recommend that the Commission accept the attached signed conciliation agreement with the Respondents containing these limited changes and close the file in this matter.

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1. Accept the attached signed conciliation agreement with Republican Party of Orange County and Jeffrey Lalloway in his official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file.